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January 22, 2019

VIA ECF

Honorable Ramon E. Reyes, Jr. United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Cortes, et al. v. Juquila Mexican Cuisine Corp., et al.

17 Civ. 3942 (RER)

Dear Judge Reyes:

We are the attorneys for the Plaintiffs in the above-referenced matter. On January 15, 2019, over a month after having received a draft settlement agreement for review, Defendant Cristobal Bonilla informed his bankruptcy counsel, Ms. Norma Ortiz, that he intended on closing the restaurant owned by Juquila Mexican Cuisine Corp. ("Juquila"), the corporate defendant whose bankruptcy has stayed this case. Although Ms. Ortiz has been able to relay this information to the undersigned, she has not been able to obtain further information regarding the individual defendants' intent to pursue settlement negotiations with Plaintiffs or Defendant Teofila Mendez's whereabouts.

Based on these developments, Plaintiffs believe that, despite Ms. Ortiz's best efforts, Defendants no longer have any interest in pursuing settlement, and that the only option is to continue the case to trial. Ms. Ortiz informed the undersigned that she has filed a motion to dismiss the Chapter 11 case, with a request for a February 21, 2019 hearing date. Once the bankruptcy action has been dismissed, the automatic stay of this case will lift. We ask that this matter be scheduled for trial at that time. Please note that the individual defendants could not be reached to discuss these developments.

We thank the Court for its patient efforts to aid the parties in reaching an amicable resolution and for its attention to the instant request.

Respectfully submitted,

Laura Rodríguez

cc: Cristobal Bonilla (via US Mail) Teofila Mendez (via US Mail) Norma Ortiz (via ECF)